

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,
Debtors.¹

PROMESA
Title III

No. 17 BK 3283-LTS
(Jointly Administered)

URGENT MOTION TO MODIFY BRIEFING SCHEDULES

¹ The Debtors in these Title III cases, along with each Debtor's respective Title III Case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19 BK 5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as bankruptcy case numbers due to software limitations).

The Ad Hoc Group of General Obligation Bondholders (the “GO Group”)¹ respectfully submits this Urgent Motion for entry of an order, substantially in the form attached hereto as **Exhibit A**, modifying the deadlines set forth in this Court’s (i) *Order Regarding Briefing Schedule* [Dkt. No. 12254] (the “Cross-Motion Scheduling Order”) for the *Amended Cross-Motion and Statement in Support on behalf of Assured Guaranty Corp., Assured Guaranty Municipal Corp., Ambac Assurance Corporation, and Financial Guaranty Insurance Company with respect to Motion of Official Committee of Unsecured Creditors to Amend Tenth Amended Notice, Case Management and Administrative Procedures Regarding Disclosure Requirements Pursuant to Federal Rule of Bankruptcy Procedure 2019* [Dkt. No. 12296] (the “Cross-Motion”) and (ii) *Order Scheduling Briefing* [Dkt. No. 11770] (the “UCC Motion Scheduling Order”) for the *Motion of Official Committee of Unsecured Creditors to Amend Tenth Amended Notice, Case Management and Administrative Procedures Regarding Disclosure Requirements Pursuant to Federal Rule of Bankruptcy Procedure 2019* [Dkt. No. 11746] (the “UCC Motion”). In support of the requested relief, the GO Group respectfully states as follows:

1. Under the Court’s Cross-Motion Scheduling Order, any responses or objections to the Cross-Motion must be filed and served by March 17, 2020, at 5:00 p.m. (Atlantic Standard Time). Replies and statements in support of the Cross-Motion must be filed and served by March 24, 2020, at 5:00 p.m. (Atlantic Standard Time).

2. The GO Group respectfully requests that the Cross-Motion Scheduling Order be modified to enlarge by three days both (i) the period for filing and serving any responses or objections to the Cross-Motion, and (ii) the period for filing and serving replies and statements in

¹ Members of the GO Group file this motion exclusively on their own behalves and do not assume any fiduciary or other duties to any other creditor or person.

support of the Cross-Motion. Thus, under the proposed order attached as Exhibit A, responses or objections to the Cross-Motion would be due by March 20, 2020, at 5:00 p.m. (Atlantic Standard Time). Replies and statements in support of the Cross-Motion would be due by March 30, 2020, at 5:00 p.m. (Atlantic Standard Time).

3. In addition, in light of the requested extensions under the Cross-Motion Scheduling Order, the GO Group requests a corresponding three-day extension of the reply deadline set forth in the UCC Motion Scheduling Order, which currently requires the Official Committee of Unsecured Creditors (the “UCC”) to file and serve its reply by March 17, 2020, at 5:00 p.m. (Atlantic Standard Time). Thus, under the proposed order attached as Exhibit A, the UCC’s reply would be due by March 20, 2020, at 5:00 p.m. (Atlantic Standard Time).

4. Counsel to the GO Group has conferred with counsel for the parties that filed the Cross-Motion (the “Cross-Movants”) and with counsel for other parties that anticipate filing responses or objection to the Cross-Motion.² Counsel to the GO Group also conferred with counsel for the UCC and counsel for the parties that filed responses or objections to the UCC Motion. Each of these parties has consented to the relief requested herein. The parties agree that there is good cause for the requested enlargement of the briefing periods, in light of the significant disruption to working conditions caused by the coronavirus crisis and related strains on the resources of the parties and their advisors.

5. Paragraph I.H of the Court’s Case Management Procedures requires that the undersigned counsel certify that they have engaged in reasonable, good-faith communications with

² In particular, counsel for the GO Group has conferred with counsel for Assured Guaranty Corp., Assured Guaranty Municipal Corp., Ambac Assurance Corporation, Financial Guaranty Insurance Company, the Ad Hoc Group of Constitutional Debtholders, the Lawful Constitutional Debt Coalition, and the QTCB Noteholder Group.

counsel to other interested parties in an effort to resolve or narrow the issues that are being brought to the Court in this Urgent Motion. Prior to the filing of this Urgent Motion, undersigned counsel has conferred with counsel to the relevant parties, including counsel for the Cross-Movants and with counsel for other parties that anticipate filing responses or objections to the Cross-Motion. Those parties have consented to the relief requested herein. The GO Group respectfully submits that, in light of the nature of the relief requested herein, no further communications are necessary under the circumstances.

* * *

For the foregoing reasons, the GO Group respectfully requests entry of an order substantially in the form attached hereto as **Exhibit A**.

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Dated: March 16, 2020

Respectfully submitted,

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